



City of Bluff City

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RECEIVED

MAR 01 2011

JOHNSON CITY ENVIRONMENTAL
ASSISTANCE CENTER



February 25, 2011

Mr. Brown Patton
TDEC-WPC
Johnson City EOC
2305 Silverdale Rd.
Johnson City, TN 37601-2162

Re: **CORRECTIVE PLAN OF ACTION**
NPDES Permit TN S077780

Dear Mr. Patton:

Please accept this correspondence and its attachment as a proposed Corrective Plan of Action, as specified by a Notice of Deficiency dated January 26, 2011.

If you have any questions, please feel free to contact the City's Stormwater Coordinator, Sarah Ketron at (423) 538-7144.

Sincerely,
CITY OF BLUFF CITY

J.C. Gentry
Vice-Mayor

Cc: Sarah Ketron, Bluff City Stormwater Coordinator
Cc: DWPC, Enforcement and Compliance Section, Nashville Central Office

CITY OF BLUFF CITY, TENNESSEE

CORRECTIVE ACTION PLAN

NPDES Permit TNS077780

February 25, 2011

Subsequent to a compliance evaluation inspection on December 21, 2010 for NPDES Permit Number TNS077780 resulting in a Notice of Deficiency dated January 26, 2011, the City of Bluff City hereby proposes to undertake all necessary actions and to implement the measures as may be necessary to comply with the terms and conditions of the permit as enumerated below. If it is found necessary, the City reserves the right to formally amend this Corrective Action Plan for approval by TDEC.

Public Education and Outreach on Storm Water Impacts

NPDES Permit-Section 4.2.1

BMP 1D: Commercial Pollution Prevention

A mailing of an updated, more detailed brochure was completed in September of 2010 to meet the milestone for Year 8. It is noted that Year 7 was missed. If a Notice of Coverage under the General Permit for Discharges from Small Municipal Storm Sewer Systems is received prior to the close of the current permit year, commercial pollution prevention will be incorporated into the City's required Public Information and Education program (PIE) per the approved NOI.

BMP 1E: Residential Pollution Prevention

Future changes to BMPs will be noted, as required, in the appropriate annual reports.

Illicit Discharge Detection and Elimination

NPDES Permit-Section 4.2.3.1.4

The City will address illegal dumping, as it pertains to stormwater, in its ordinance through a revision. In an effort to maintain order within the City code, and to simplify the revision process, the city would like to group multiple revisions together. To achieve this, the City proposes have all changes adopted by close of the permit year.

BMP 3B- Illicit Discharge Ordinance

The City seeks to add the prohibition of "hotspots" to its ordinance through a revision as mentioned above.

Construction Site Water Runoff Control

NPDES Permit-Section 4.2.5.1.4

The City seeks to add provisions about the control of waste to its ordinance through a revision as mentioned above.

Post-Construction Site Water Runoff Control

NPDES Permit-Section 4.2.5.1.5

The City seeks to add provisions to ensure long-term operation and maintenance of BMPs to its ordinance through a revision as mentioned above.

Pollution Prevention/Good Housekeeping for Municipal Operations

NPDES Permit-Section 4.2.6.1.3

The barrels noted at the inspection have been discarded with the exception of one. The remaining barrel contains non-contaminated soil that was tested by the TDEC underground Storage Tank section.

The waste oil filters have been disposed of and documentation is provided as an attachment.

RTE 8

SULLIVAN

CERTIFIED MANIFEST/INVOICE

No. 206175

BILL TO:
CITY OF BLUFF CITY
P.O. BOX 70BLUFF CITY TN 37618
(423) 538-7144

GENERATOR/CUSTOMER:

CITY OF BLUFF CITY - GARAGE - DRU
@ RAILROAD STREETBLUFF CITY TN 37618
(423) 612-4145
JONATHAN

HM	PROPER SHIPPING NAME/DESCRIPTION	HAZARD CLASS	I.D. Number	Pkg. Grp.	Unit	Estimated Quantity	Actual Quantity	Unit Price	Total Price
X	Fuel Oil (No. 1, 2, 4, 5, or 6) Flammable Liquid	3	NA1993	III	Gls.				
X	Flammable Liquids, n.o.s. (Used Antifreeze)	3	UN1993	I					
X	Combustible Liquid, n.o.s. (Used Oil)	COMBUSTIBLE LIQUID	NA1993	III					
X	Combustible Liquid, n.o.s. (Used Oil & Water Mix)	COMBUSTIBLE LIQUID	NA1993	III					
X	Combustible Liquid, n.o.s. (Water Soluble Oil)	COMBUSTIBLE LIQUID	NA1993	III					
X	Combustible Liquid, n.o.s. (Petroleum Contact Water)	COMBUSTIBLE LIQUID	NA1993	III					
	Used Oil Filters								
	Empty Drums								
	Contaminated Absorbent								
	Clean Absorbent								
	Absorbent Setup (1 Clean ABS & Empty Drum)								
	Sludge								
	OD/OF					1	1		

* CLOR-D-TECT Performed: Date

Driver ID

Total Drums Pumped

Leave Replacement Drums

ARRIVAL TIME	DEPART TIME	CASH	CHARGE	CHECK NO.	C.O.D.	P.O. REQ'D	CUSTOMER P.O. #
							007276

TRANSPORTER/RECYCLER/CERTIFICATION

THIS IS TO CERTIFY THE ABOVE DESCRIBED MATERIALS HAVE BEEN PICKED UP AND WILL BE TRANSPORTED, TREATED, REPROCESSED AND/OR DISPOSED OF IN A MANNER PURSUANT TO ALL FEDERAL, STATE AND LOCAL GUIDELINES.

DRIVER'S SIGNATURE

DATE

TRUCK/TRAILER #

B 5092 G 17342

THIS IS TO CERTIFY THAT THE ABOVE-NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

PER

COMMENTS: 11 hrs - 8:00-4:30 p.m. - Make sure that someone gets copy of manifest

BY MY SIGNATURE BELOW I ACKNOWLEDGE AND AGREE WITH THE ABOVE AND FURTHER ACKNOWLEDGE THAT I HAVE READ AND AGREE TO THE PROVISIONS AND TERMS SET FORTH ON THE REVERSE SIDE OF THIS MANIFEST.

CUSTOMER SIGNATURE

TITLE

DATE

WHITE - ORIGINAL COPY

YELLOW - ACCOUNTING COPY

PINK - CUSTOMER COPY